

FPS:lm

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

-vs-

ALLAN ROSS,

Defendant

**3: CR 07-0410**

NO. 3:CR-07-

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

FILED  
SCRANTON  
OCT 16 2007  
PER JW  
DEPUTY CLERK

From in or about May 2007 to on or about October 8, 2007, in Lackawanna and  
Northumberland Counties, in the Middle District of Pennsylvania, and elsewhere, the defendant,

**ALLAN ROSS,**

used and attempted to use a facility and means of interstate commerce, that is, the internet via  
computer, to knowingly attempt to persuade, induce and entice an individual who had not  
attained the age of 18 years, to engage in sexual acts as defined in Title 18, United States Code,  
Section 2246, and the sexual acts would be a violation of chapter 109A of Title 18, to wit, Title  
18, United States Code, Section 2243(a), if the sexual acts occurred in the special maritime and  
territorial jurisdiction of the United States.

All in violation of Title 18, United States Code, Section 2422(b).

THE GRAND JURY FURTHER CHARGES:

**COUNT 2**

From in or about May 2007 to on or about October 12, 2007, in Northumberland County,  
in the Middle District of Pennsylvania, the defendant,

**ALLAN ROSS,**

did willfully and knowingly receive visual depictions of minors engaged in sexually explicit  
conduct that were mailed, shipped and transported, and which contained materials that were  
mailed, shipped and transported, in interstate and foreign commerce, by means of computer.

In violation of Title 18, United States Code, Section 2252(a)(2).

THE GRAND JURY FURTHER CHARGES:

**COUNT 3**

From on or about October 8, 2007 to on or about October 12, 2007 in Northumberland County, in the Middle District of Pennsylvania, the defendant,

**ALLAN ROSS,**

did knowingly possess one or more matters which contained visual depictions of a minor engaged in sexually explicit conduct, the production of which involved the use of a minor engaging in sexually explicit conduct, which had been shipped and transported in interstate and foreign commerce and which was produced using materials which had been shipped and transported in interstate and foreign commerce, to wit: the defendant was in knowing possession of numerous visual depictions of minors engaging in sexually explicit conduct, the production of which involved the use of a minor engaging in sexually explicit conduct, all of which were downloaded from a computer to floppy discs and CDs in the defendant's possession.

In violation of Title 18, United States Code, Section 2252(a)(4)(B)

**A TRUE BILL:**

10/16/07  
DATE

  
GRAND JURY FOREPERSON

Martin C. Carlson *F.P.S.*  
MARTIN C. CARLSON  
Acting United States Attorney